MOTOROLA

October 20, 2000

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals, TW-A325
445 12th Street, S.W.
Washington, D.C. 20554

Re: WT Docket No. 96-86

Dear Ms. Salas:

This letter is written on behalf of Motorola, Inc. (Motorola). On October 19, 2000, Motorola met with Adam Krinsky, Legal Advisor to Commissioner Gloria Tristani; Kathleen O'Brien Ham, Deputy Chief, Wireless Telecommunications Bureau and D'Wana Terry, Chief, Public Safety and Private Wireless Division. Attending from Motorola were Ellen O'Hara, Bruce Oberlies and Bill Pagones of the Commercial, Government, Industrial Systems Solutions Sector and Jeanine Poltronieri, of the Government Relations Office. The parties discussed a wide range of issues related to public safety and private wireless communications systems.

Part of the discussion related to the ongoing work of the National Coordinating Committee ("NCC"). Motorola discussed ANSI/TIA/EIA 102.BAAA-1 and 102.BABA Project 25 FDMA Common Air Interface and Vocoder standards, which were selected in an open, consensus-based process by the NCC as the preferred technology for narrowband interoperability. Consistent with its comments filed in the proceeding, Motorola expressed its views that:

- Public safety users need to gain access to the spectrum in the 700 MHz band quickly. In its comments, APCO recommended an end of November deadline for adoption of FCC rules that endorse the recommendations submitted by NCC in February 2000. Motorola supports such action by the FCC to facilitate faster access to and deployment of the spectrum, consistent with Congressional intent to promote public safety interoperability nationwide and access to the 700 MHz band.

- Project 25 Phase I is suitable to a broad range of public safety users who will utilize this spectrum. Project 25 Phase I provides scalability that allows both small, rural public safety agencies and larger, urban public safety agencies to use the same technology and interoperate.

- Equipment that meets the requirements of the U.S. public safety community and utilizes a 6.25 kHz channel width or equivalent is not available in the near term. Public safety users rely on handheld radios that must last for the entire work shift. Operation at 6.25 kHz or equivalent requires the use of linear technology which is less power efficient than technologies used for 12.5 kHz implementations. Current linear technology handsets operate at substantially lower power levels than those of Project 25 Phase I to address issues of size, battery life and heat dissipation. Second, the lower power levels of linear radios require more infrastructure sites to provide comparable coverage. This adds to the costs of installation and site acquisition, especially for rural public safety agencies that must cover large geographic areas.

- The apparent spectral efficiency of a radio system is only one aspect that users and the FCC must consider in technology decisions for the 700 MHz band. Technical, economic and political issues also play a significant role in the deployment of an effective and efficient public safety communications system. The FCC has a public interest obligation to consider the totality of these issues, just as the NCC did in reaching its recommendation that Project 25 Phase I be adopted as the interoperability standard in the 700 MHz band.

Please contact Jeanine Poltronieri at (202) 371-6896 regarding any questions concerning this matter.

Respectfully Submitted,

Jeanine Poltronieri
Director
Motorola, Inc.

Cc:

Kathy Brown, Chief of Staff, Federal Communications Commission
Clint Odom, Legal Advisor to Chairman William E. Kennard
Adam Krinsky, Legal Advisor to Commissioner Gloria Tristani
Bryan Tramont, Legal Advisor to Commissioner Harold Furchtgott-Roth
Peter Tenhula, Legal Advisor to Commissioner Michael Powell
Mark Schneider, Legal Advisor to Commissioner Susan Ness
Kathleen O'Brien Ham, Deputy Chief, Wireless Telecommunications Bureau
D'Wana Terry, Chief, Public Safety and Private Wireless Division